

IN THE UNITED STATES OF AMERICA  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	
	§	CRIMINAL NO. M-19-0522-S1
RICARDO QUINTANILLA	§	
also known as "Richard"	§	
JOHN F. CUELLAR	§	
ARTURO C. CUELLAR, JR.	§	
also known as "AC"	§	
DANIEL J. GARCIA	§	

UNOPPOSED MOTION FOR LEAVE TO TRAVEL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, DANIEL J. GARCIA., Defendant in the above-styled and numbered cause, and files this his Motion For Leave To Travel and, as grounds therefore, would respectfully show unto the Court the following:

I.

Defendant stands charged by indictment with a multi-count indictment alleging conspiracy to commit wire fraud and money laundering in the qabove styled and numbered case. His next scheduled hearing is on November 25, 2019, when he is set for Final Pre-trial. Defendant is on bond and he has been compliant with his bond conditions.

II.

Defendant is a licensed attorney and represents Daniel Acuna in Criminal No. 1:18-CR-234, styled *United States of America vs. Daniel Acuna, et al*, in the United States District Court for the Northern District of Georgia, Atlanta Division and would like to

travel to Atlanta, Georgia to visit with his client in preparation for a pre-trial conference scheduled on June 26, 2019, in Atlanta Georgia. Defendant, GARCIA would depart from McAllen International Airport on Wednesday, June 19, 2019 and arrive in Atlanta Georgia that same day and return on Friday, June 21, 2019 to McAllen, Texas. Defendant, Garcia would again fly from McAllen International Airport on June 25, 2019 and return June 26, 2019 after the final pretrial hearing. Defendant is currently restricted to travel only in the Southern District of Texas.

**III.**

Defendant will be staying at the OMNI CNN in Atlanta, Georgia.

**IV.**

This request for leave to travel is *unopposed* by Defendants Pre-Trial Service officer and by Assistant United States Attorney, Robert "Bobby" Lopez, Jr.

**WHEREFORE, PREMISES CONSIDERED,** Defendant DANIEL J. GARCIA. prays that he be granted leave to travel as requested above, subject to any additional conditions set by the Court may want to impose in connection with his travel request.

Respectfully submitted,

**G. ALLEN RAMIREZ**  
**ATTORNEY AT LAW**  
515 East 2<sup>nd</sup> St.  
Rio Grande City, TX 78582  
TEL: (956) 487-4585  
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By: /s/ G. Allen Ramirez  
**G. ALLEN RAMIREZ**  
State Bar No. 16501800

Federal I.D. No. 7762

**CERTIFICATE OF CONFERENCE**

This is to certify that counsel for the Defendant has consulted with Assistant United States Attorney, Robert “Bobby” Lopez, Jr. and he is *unopposed* to this motion.

/s/ G. Allen Ramirez  
G. ALLEN RAMIREZ

**CERTIFICATE OF SERVICE**

I, hereby certify that on this the 14<sup>th</sup> day of June 2019 a true and correct copy of the foregoing *Unopposed Motion for Leave to Travel* was forwarded to the following parties:

*Via E-Mail Transmission:*

Robert Lopez, Jr.  
Assistant U.S. Attorney  
1701 West Highway 83, Suite 600  
McAllen, Texas 78501

*Via Regular Mail:*

United States Pre-Trial Services  
1701 W. Business 83, Suite 305  
McAllen, Texas 78501

/s/ G. Allen Ramirez  
G. ALLEN RAMIREZ